

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

KEENAN D. TATE

Case: 4:25-mj-30297

Judge: Ivy, Curtis

Filed: 05-08-2025

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 4, 2025 in the county of Genesee in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of a firearm
18 U.S.C. § 922(o)	knowingly possessed a machinegun

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: May 8, 2025

City and state: Flint, MI

  
Complainant's signature

Nathan Sutara, Special Agent, ATF

Printed name and title



Judge's signature

Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title



**AFFIDAVIT**

I, Nathan Sutara, being duly sworn, depose and state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I have been employed as a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since May 2018. I am currently assigned to the Detroit, Michigan Field Division, Flint Field Office. As an ATF agent, I am tasked with investigating criminal violations involving firearms, narcotics and violent crime offenses including violations of Title 18 and Title 21 of the United States Code. Before working with ATF, I was employed by the Michigan Department of State Police (MSP) for approximately five years. I held several positions with MSP, including Detective/Trooper with the Major Case Unit in Saginaw, Michigan. During this employment, I investigated numerous incidents involving violations of state and federal firearms laws, robberies, shootings, and homicides, as well as narcotics trafficking.

2. I make this affidavit based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of documents, and information gained through my training and experience. The information outlined below is provided for



the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. Based on the facts below, there is probable cause that on May 4, 2025, in the Eastern District of Michigan, Keenan D. Tate, after having been previously convicted of a felony offense, knowingly possessed a firearm in violation of 18 U.S.C. § 922(g)(1), and knowingly possessed a machinegun in violation of 18 U.S.C. § 922(o).

### **BACKGROUND**

4. On May 4, 2025, Flint Township Police conducted a traffic stop on a vehicle in which Keenan D. Tate was the front seat passenger. Police placed the driver in custody as he did not have an operator's license on his person. While taking the driver into custody, Tate got out of the vehicle and ran behind a nearby house.

5. Shortly thereafter, police apprehended Tate in the garden section of a nearby Walmart store.

6. During their investigation, police learned that Tate was captured on surveillance footage showing him at three separate nearby residences, all in the path of his flight from the vehicle to the Walmart store.



7. In the first video, the homeowner's video surveillance showed Tate jump a fence while carrying a black firearm in his right hand. After jumping the fence, Tate dropped his cell phone, which he then retrieved while continuing to run with the firearm in his right hand.



8. In the second video, from the home immediately south of the home in paragraph 7, the homeowner informed police he observed surveillance video of Tate in the homeowner's driveway and then hiding under the homeowner's vehicle. In the video, Tate had his cell phone in his hand, but the firearm was no longer visible.

9. In the third video, from the Walmart store where Tate was apprehended, a Walmart Asset Protection Officer advised police that Tate was captured on surveillance cameras exiting the garage of a third residence immediately prior to entering Walmart. Police spoke with the homeowner of the third home who advised that they confronted Tate in their attached garage. When they opened the garage door, Tate ran towards Walmart. Police found a black and orange jacket in the attached garage, which matched the black and orange jacket Tate was wearing when he fled from police. When Tate was apprehended in Walmart, he was no longer wearing the black and orange jacket.



10. The following day, police retraced Tate's flight from the vehicle to the nearby Walmart store. At the second residence, referenced in paragraph 8 above, police found a firearm in a small aluminum shed hidden behind two pieces of steel roofing. The firearm was on a tire behind the pieces of steel roofing. The firearm was identified as a Glock, Model 30S, .45 caliber pistol with a Glock switch affixed to it. The firearm contained nine live .45 caliber rounds of ammunition; eight rounds in the magazine and one round in the chamber.

11. I have observed the Glock, Model 30S, .45 caliber pistol and reviewed the surveillance video from the home referenced in paragraph 7. The Glock pistol is the same color, shape, and size of the pistol Tate is carrying in the video.

12. I know that Glock switches convert semi-automatic Glock pistols to fully automatic machineguns. That is, Glock switches convert Glock pistols to shoot automatically more than one shot, without manual reloading, by a single function of the trigger. Additionally, a Glock switch affixed to the butt end of a firearm, as here, is readily apparent to anyone who holds the firearm.

13. I have reviewed Tate's criminal history. Tate was sentenced in 2009 in the Wayne County Circuit Court to 5 to 20 years in prison following his conviction for carjacking, a felony offense punishable by a term of imprisonment exceeding one year.



14. I have spoken with ATF Special Agent Kyle McGraw regarding the Glock, Model 30S, .45 caliber pistol. Special Agent McGraw has received specialized training regarding the manufacture and shipping of firearms. Special Agent McGraw stated that the Glock firearm was manufactured outside the state of Michigan. Accordingly, the firearm was possessed in and affecting commerce.

**CONCLUSION**

15. Based on the above information, I have probable cause that on May 4, 2025, Keenan D. Tate, after having been previously convicted of a felony offense, knowingly possessed a firearm in violation of 18 U.S.C. § 922(g)(1), and knowingly possessed a machinegun in violation of 18 U.S.C. § 922(o).

Respectfully submitted,



Nathan Sutara  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means on this 8th day of May, 2025.



---

Hon. Curtis Ivy, Jr.,  
United States Magistrate Judge